

Jeff P. Prostok  
Texas Bar No. 16352500  
J. Robert Forshey  
State Bar No. 07264200  
Lynda L. Lankford  
State Bar No. 11935020  
FORSHEY & PROSTOK, L.L.P.  
777 Main Street, Suite 1290  
Fort Worth, Texas 76102  
(817) 877-8855 • (817) 877-4151 Fax  
Email: [jprostok@forsheyprostok.com](mailto:jprostok@forsheyprostok.com)  
Email: [bforshy@forsheyprostok.com](mailto:bforshy@forsheyprostok.com)  
Email: [llankford@forsheyprostok.com](mailto:llankford@forsheyprostok.com)

ATTORNEYS FOR ORIGIN BANK

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE:	§	CASE NO. 19-31484-sgj11
THE LASALLE GROUP, INC., et al. <sup>1</sup>	§	Chapter 11
Debtor.	§	
	§	
	§	

**ORIGIN BANK'S OBJECTION TO MOTION OF TLG FAMILY MANAGEMENT  
TO EXPEDITE CONSIDERATION OF MOTION FOR ALLOWANCE AND PAYMENT OF  
ADMINISTRATIVE EXPENSES PURSUANT TO 11 U.S.C. § 503(B)(1)**

TO THE HONORABLE STACEY G.C. JERNIGAN, UNITED STATES BANKRUPTCY JUDGE:

Origin Bank ("Origin"), a creditor herein, files its objection (the "Objection") to the *Motion for Expedited Consideration of TLG Family Management's Motion for Allowance and Payment of Administrative Expenses Pursuant to 11 U.S.C. § 503(b)(3)* (the "Motion to Expedite") [Docket No. 325] filed by TLG Family Management, LLC ("TLG") with respect to the *Motion for Allowance and Payment of Administrative Expenses Pursuant to 11 U.S.C. § 503(b)(1)* (the "Motion for Administrative Claims") [Docket 304] and, in support thereof, states as follows:

---

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: The LaSalle Group, Inc. (0143) ("LaSalle"); West Houston Memory Care, LLC (2760) ("West Houston"); Cinco Ranch Memory Care, LLC (2716); Pearland Memory Care, LLC (5311); and Riverstone Memory Care, LLC (5407). The Debtors' mailing address is 545 E. John Carpenter Freeway, Suite 500, Irving, Texas 75062.

1. TLG filed the Motion for Administrative Claims on August 13, 2019.
2. The Motion for Administrative Claims provides for an objection deadline of September 3, 2019.
3. Origin intends to object to the Motion for Administrative Claims.
4. Just prior to the Petition Date, the Debtor's former president, Mitch Warren caused LaSalle to transfer the controlling management interest in TLG from LaSalle to himself so that he could direct TLG's activities during the bankruptcy case.

5. In addition to the TLG equity transfer, the following prepetition transfers were made by LaSalle:

- \$374,000 to TLG for "Intercompany Loans" within 2 days of the Petition Date.<sup>2</sup>
- \$230,500 to Mitch Warren as "Distributions" within the year prior to the Petition Date, including \$100,000 eight (8) days prior to the Petition Date.<sup>3</sup>
- \$70,000 to Mitch Warren as "Shareholder Loans" within the year prior to the Petition Date.<sup>4</sup>

6. Based on representations by Debtors' counsel to the Court, Origin believes the Debtors' cases are expected to conclude, whether by conversion or dismissal, in the near future. If converted, a Chapter 7 Trustee will be appointed.

7. Even if TLG holds viable administrative claims against the Debtors' estates, which Origin disputes, any subsequently appointed Chapter 7 Trustee should be involved in the review of TLG's proposed Administrative Claims and the causes of action, counterclaims, defenses and offsets that the Debtors' estates hold against TLG and its principals. These matters raise numerous factually and legally complex issues that will need to be reviewed, considered and litigated in connection with the TLG administrative claim request.

---

<sup>2</sup> LaSalle SOFA ¶¶4.1751-4.1752.

<sup>3</sup> LaSalle SOFA ¶¶4.1079 – 4.1080, 4.1082, 4.1087-4.1089.

<sup>4</sup> LaSalle SOFA ¶¶4.1083 - 4.1086.

8. Moreover, there is no immediate need to determine the allowance or disallowance of the requested administrative claims. Among other reasons, the sale hearing is not expected to go forward on August 28, 2019.

9. For these reasons, consideration of the Motion for Administrative Claims on an expedited basis is inappropriate.

**PRAYER FOR RELIEF**

WHEREFORE, Origin Bank respectfully requests that this Court enter an order denying the Motion to Expedite and granting such other relief as is just and appropriate.

DATED: August 22, 2019.

Respectfully Submitted,

/s/ Lynda L. Lankford  
Jeff P. Prostok  
Texas Bar No. 16352500  
J. Robert Forshey  
State Bar No. 07264200  
Lynda L. Lankford  
State Bar No. 11935020  
**FORSHEY & PROSTOK, LLP**  
777 Main Street, Suite 1290  
Fort Worth, TX 76102  
(817) 877-8855 • (817) 877-4151 fax  
[jprostok@forsheyprostok.com](mailto:jprostok@forsheyprostok.com)  
[bforshey@forsheyprostok.com](mailto:bforshey@forsheyprostok.com)  
[llankford@forsheyprostok.com](mailto:llankford@forsheyprostok.com)

ATTORNEYS FOR ORIGIN BANK

**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2019, a true and correct copy of the above and foregoing document was served via ECF Electronic Notice on all counsel of record.

/s/ Lynda L. Lankford